

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BRITTNEY GOBBLE PHOTOGRAPHY, LLC	§	
	§	
<i>Plaintiff,</i>	§	
vs.	§	Case No. 1:18-cv-03403-RDB
	§	
SINCLAIR BROADCAST GROUP, INC.	§	(Lead Case)
	§	
<i>Defendant</i>	§	JURY TRIAL DEMANDED
_____	§	
BRITTNEY GOBBLE PHOTOGRAPHY, LLC	§	
	§	
<i>Plaintiff,</i>	§	
vs.	§	Case No. 1:18-cv-03384-RDB
	§	
KABB LICENSEE, LLC <i>et al.</i>	§	
	§	
<i>Defendants</i>	§	
_____	§	
BRITTNEY GOBBLE PHOTOGRAPHY, LLC	§	
	§	
<i>Plaintiff,</i>	§	
vs.	§	Case No. 1:19-cv-00559-RDB
	§	
KMPH LICENSEE, LLC <i>et al.</i>	§	
	§	
<i>Defendants</i>	§	
_____	§	

BRITTNEY GOBBLE PHOTOGRAPHY, LLC	§	
	§	
<i>Plaintiff,</i>	§	
vs.	§	Case No. 1:19-cv-00606-RDB
	§	
SINCLAIR PORTLAND LICENSEE, LLC <i>et al.</i>	§	
	§	
<i>Defendants</i>	§	
_____	§	

MOTION TO EXTEND TIME TO RESPOND TO DISCOVERY

Defendants listed on the attached Exhibit 1 submit this Motion to Extend Time to Respond to Discovery and state as follows:

1. On June 4, 2019, Plaintiff served its First Set of Common Interrogatories to Defendants and its First Set of Requests for Production of Documents to Defendants on sixty-six (66) Defendants. Twenty-two (22) Defendants had been added as a result of the Amended Complaint filed on May 14, 2019, ECF 44, and the remaining Defendants have been parties in the case since filing in 2018, but no discovery had been served on them.
2. Defendants' counsel requested a two-week extension to July 19, 2019, and Plaintiff's counsel agreed to the requested extension.
3. Discovery responses for four Defendants have now been finalized, but discovery responses for the sixty-two (62) Defendants listed on Exhibit 1 have not yet been finalized. Due to the volume of parties at issue, preparation of responses has been extremely time-consuming.
4. Until July 19, 2019, Defendants' counsel anticipated that she would be able to submit the discovery responses by that date.

5. Defendants' counsel has prepared the discovery responses but client review and finalization has not yet been completed.

6. Defendants require an additional week, to July 26, 2019, in which to provide the discovery responses.

7. By email on Friday July 19, 2019 to Plaintiff's counsel Mr. Allen, copied to Plaintiff's counsel Mr. Quisenberry and Mr. Brown, Defendant's counsel requested that Plaintiff's counsel consent to the requested extension but has not yet received a response to that request.

8. Defendant makes this request in good faith, for good cause shown, and not for purposes of delay. The requested extension will not cause a delay in the case.

WHEREFORE, Defendants request that this Court enter an order extending the date for them to respond to the Plaintiff's First Set of Common Interrogatories to Defendants and the Plaintiff's First Set of Requests for Production of Documents to Defendants to July 26, 2019.

Dated: July 19, 2019

Respectfully submitted,

/s/ Margaret L. Argent
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 19th day of July, 2019, a copy of the foregoing motion was filed electronically. Notice of the filing will be sent to all parties who have appeared by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

I FURTHER HEREBY CERTIFY, that on this 19th day of July, I caused a copy of the foregoing motion to be served as follows on Third-Party Defendant USA Entertainment News, Inc.:

Via First Class U.S. Mail, Postage Prepaid

USA Entertainment News, Inc.
c/o Frankfurt Kurnit Klein & Selz, P.C.
488 Madison Avenue, 10th Floor
New York, NY 10022
Attn: Mike Dolan

Via First Class Airmail, Postage Prepaid

USA Entertainment News, Inc.
c/o Lloyd Beiny, Registered Agent
4A Tileyard Studios
Tileyard Road
London N7 9AH
UNITED KINGDOM

/s/
Margaret L. Argent